

Hearing Aid Compatible Telephones  
WT Docket No. 01-309  
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- 1) Digital wireless phones tested. Cellular South presently purchases wireless telephone handsets that are manufactured by or for Nokia, Motorola, UT Starcom, LG, and Kyocera (collectively, "Vendors"). To our knowledge, these Vendors are not presently offering to Cellular South any CDMA/1X devices that have been fully determined to be compliant with the ANSI C63.19 standard ("Compliant Phones"). Motorola asserts that their models E815 and V323 have been measured per the compliance standard, and that these models have achieved an ANSI C63.19 rd 3.4 rating of M4. However, Motorola has not yet made these compliant devices available to Cellular South. Nokia asserts their models 6015i, 6255i, 3155i, and 6155i to be "M3" compliant based upon "preliminary testing"; however, they state that further validation is required. Cellular South currently offers the 6015i and 6255i for sale in all retail locations.
- 2) Laboratory used. Cellular South does not presently have the means to internally conduct adequate testing of handset devices for compliance with the ANSI C63.19 standard. At present, Cellular

South intends to rely on its Vendors or their appointed distributors to conduct such testing, and to further rely on its Vendors representations regarding the compliance of each specific handset device.

- 3) Test results for each phone tested. No testing has been conducted by Cellular South to date.
- 4) Identification of compliant phone models and ratings according to ANSI C63.19. As earlier indicated herein, Motorola has conveyed to Cellular South that their models E815 and V323 are compliant at a rating of M4; Motorola has not yet made these models available to Cellular South. Nokia has conducted preliminary testing that indicates their models 6015i, 6255i, 3155i, and 6155i to be compliant at a rating of M3, however Nokia has stated that further validation is required. Cellular South presently offers the Nokia 6015i and Nokia 6255i for sale in all retail outlets; Nokia has indicated that their models 6155i and 3155i will be available in the Fall of 2005.
- 5) Report on the status of product labeling. Cellular South typically relies upon its Vendors to label all products prior to their shipment to our retail locations. Nokia has indicated that compliant models will include a "M3" text designation on the product box label. We are not aware of how other Vendors plan to label compliant devices.
- 6) Report on outreach efforts. As CDMA/1X HAC devices become available, Cellular South will employ reasonable efforts to publicly identify compliant phones for consumers and audiologists. Cellular South will also consider listing compliant phones on its Internet Site, and will explore effective ways to communicate relevant information to consumer groups. Retail salespeople will be trained regarding which digital wireless phones are compliant. Promotional materials and brochures provided by Vendors will be made available to consumers, businesses, and audiologists. Cellular South presently offers a 30-day trial period to all customers, and would presently intend to make this trial period available to customers seeking Compliant Phones.
- 7) Retail availability of Compliant Phones. As indicated previously herein, no devices that have been determined to be Compliant Phones are presently available in Cellular South's retail outlets. The Nokia 6015i and 6255i -- which may hereafter be determined to be compliant -- are presently available in Cellular South retail

outlets; to our knowledge, Nokia has conducted only preliminary testing on these devices.

- 8) Incorporation of hearing aid compatibility features into newer models of digital wireless phones. Motorola asserts that every Motorola phone that ships in the United States incorporates a telecoil in the speaker for the specific purpose of coupling with hearing aid telecoils. UT Starcom is believed to be developing a CDM180 model that will be a Compliant Phone (an availability date has not been conveyed to Cellular South). Motorola, Kyocera, Nokia, and UT Starcom have represented to Cellular South their intent to comply with FCC HAC requirements.
- 9) Activities related to ANSI C63.19 or other standards work intended to promote compliance with the FCC Order. UT Starcom, Kyocera, Motorola, and Nokia have each expressed to Cellular South their intent to comply with FCC HAC requirements. Both Nokia and Motorola are participating in the Alliance for Telecommunications Industry Solutions Incubator for HAC.
- 10) Number of compliant and non-compliant phone models offered at this time. Twenty-nine phone models are currently offered for sale in various Cellular South retail stores. Excluding discontinued models and refurbished handsets, Cellular South's core assortment presently includes twelve models of CDMA devices. To our knowledge, none of these have been fully determined to be Compliant Phones.
- 11) Differences in handset offerings among regions in service areas. Differences in handset offerings among regions in Cellular South's service area are common, and result from variable sell-through rates, controlled tests designed to demonstrate consumer response to selected new phones, and other factors. Cellular South's core assortment is presently consistent in all markets.
- 12) Ongoing efforts for interoperability testing with hearing aid devices. To date, Cellular South has not conducted such interoperability testing.